REC'D TH

BellSouth Telecommunications, Inc.

333 Commerce Street, Suite 2101 Nashville, TN 37201-3300

guy.hicks@bellsouth.com

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Guy M. Hicks General Counsel

OFFICE OF THE

615 214 6301 Fax 615 214 7406

November 20, 2001

VIA HAND DELIVERY

Mr. David Waddell, Executive Secretary Tennessee Regulatory Authority 460 James Robertson Parkway Nashville, Tennessee 37243

> Re: Docket to Determine the Compliance of BellSouth Telecommunications, Inc.'s Operations Support Systems with State and Federal Regulations

Docket No. 01-00362

Dear Mr. Waddell:

Enclosed please find the original and thirteen copies of the BellSouth's Motion for Reconsideration. Copies have been provided to counsel of record.

Very truly yours,

Guy M. Hicks

GMH/jej

Enclosure

BEFORE THE TENNESSEE REGULATORY AUTHORITY NASHVILLE, TENNESSEE

In Re:

Docket to Determine the Compliance of BellSouth Telecommunications, Inc.'s Operations Support Systems with State and Federal Regulations

Docket No. 01-00362

MOTION FOR RECONSIDERATION

Comes now BellSouth Telecommunications, Inc. ("BellSouth") and files this, its Motion to Reconsider the Order Resolving Procedural Motions dated November 14, 2001, and would show as follows:

- 1. The referenced Order in paragraph 1 of the Order purports to strike the report on Georgia's OSS completed by KPMG and the PwC Report and Attestation on the grounds that BellSouth's witness list, filed on November 9, 2001, does not include third party witnesses.
- 2. The witnesses in question, Mr. Mike Weeks and Mr. Robert Lattimore, are available to testify, all as shown by the letter and Notice of Appearance, a copy of which is attached hereto as Exhibit "A."

WHEREFORE, BellSouth requests that the Order be reconsidered to allow Mr. Weeks and Mr. Lattimore to testify on the Georgia OSS Report completed by KPMG and the PwC Report and Attestation, respectively, and that the Report and Attestation not be stricken.

Respectfully submitted,

BELLSOUTH-TELECOMMUNICATIONS, INC.

By:

Guy M. Hicks 333 Commerce Street, Suite 2101 Nashville, Tennessee 37201-3300 (615) 214-6301

Fred J. McCallum, Jr. Lisa S. Foshee 675 W. Peachtree St., NE, Suite 4300 Atlanta, Georgia 30375

CERTIFICATE OF SERVICE

I hereby certify that on November 20, 2001, a copy of the foregoing document was served on counsel for known parties, via the method indicated, addressed as follows:

| [] Hand [] Mail | James P. Lamoureux AT&T 1200 Peachtree St., NE, #4068 Atlanta, GA 30367 |
|---|---|
| [] Hand [] Mail Facsimile [] Overnight | James Wright, Esq. United Telephone - Southeast 14111 Capitol Blvd. Wake Forest, NC 27587 |
| [] Hand [] Mail Facsimile [] Overnight | H. LaDon Baltimore, Esquire Farrar & Bates 211 Seventh Ave. N, # 320 Nashville, TN 37219-1823 |
| [] Hand [] Mail Facsimile [] Overnight | Henry Walker, Esquire Boult, Cummings, et al. P. O. Box 198062 Nashville, TN 37219-8062 |
| [] Hand [] Mail Facsimile [] Overnight | Jon E. Hastings, Esquire Boult, Cummings, et al. P. O. Box 198062 Nashville, TN 37219-8062 |
| [] Hand [] Mail Facsimile [] Overnight | Timothy Phillips, Esquire Office of Tennessee Attorney General P. O. Box 20207 Nashville, Tennessee 37202 |
| [] Hand [] Mail Facsimile [] Overnight | Charles B. Welch, Esquire Farris, Mathews, et al. 618 Church St., #300 Nashville, TN 37219 |
| [] Hand[] MailFacsimile[] Overnight | Terry Monroe Competitive Telecom Assoc. 1900 M St., NW, #800 Washington, DC 20036 |

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Jack Robinson, Esquire Gullett, Sanford, Robinson & Martin 230 Fourth Ave., N., 3d Fl. Nashville, TN 37219-8888



@ BELLSOUTH

BellSouth Telecommunications, Inc. 333 Commerce Street, Suite 2101 Nashville, TN 37201-3300 Guy M. Hicks General Counsel

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615 214 6301 Fax 615 214 7406

November 20, 2001

VIA HAND DELIVERY

Mr. David Waddell, Executive Secretary Tennessee Regulatory Authority 460 James Robertson Parkway Nashville, Tennessee 37243

Re: Docket to Determine the Compliance of BellSouth Telecommunications, Inc.'s

Operations Support Systems with State and Federal Regulations

Docket No. 01-00362

Dear Mr. Waddell:

Enclosed please find a Notice of Appearance. This Notice has the practical effect of amending the witness list to include Mr. Robert Lattimore, of PwC, and Mr. Michael Weeks, of KPMG. Mr. Weeks will appear on behalf of KPMG on Monday, December 3, 2001 at 9:00 a.m. Mr. Lattimore will appear on behalf of PwC on Tuesday, December 4, 2001 at 9:00 a.m.

Wery truly yours,

Guy M. Hicks

GMH/jej

Enclosure

BEFORE THE TENNESSEE REGULATORY AUTHORITY NASHVILLE, TENNESSEE

In Re:

Docket to Determine the Compliance of BellSouth Telecommunications, Inc.'s Operations Support Systems with State and Federal Regulations

Docket No. 01-00362

NOTICE OF APPEARANCE

BellSouth Telecommunications, Inc. ("BellSouth") hereby notifies the Tennessee Regulatory Authority ("TRA") that, pursuant to the request of the TRA, BellSouth has conveyed to KPMG Consulting and PwC the desire of the TRA that each make representatives available for questioning by the Authority and interested parties. As an accommodation to the TRA, KPMG Consulting and PwC have agreed to make representatives available for questioning. These representatives will appear solely on behalf of their respective companies and are not appearing as BellSouth's witnesses.

Mr. Michael Weeks will appear on behalf of KPMG Consulting on Monday, December 3, 2001 at 9:00 am. Mr. Robert Lattimore will appear on behalf of PwC on Tuesday, December 4, 2001 at 9:00 am.

Respectfully submitted,

BELLSOUTH TELECOMMUNICATIONS, INC.

Guy M. Hicks 333 Commerce Street, Suite 2101 Nashville, Tennessee 37201-3300 (615) 214-6301

Fred J. McCallum Lisa Foshee 675 W. Peachtree Street, Suite 4300 Atlanta, Georgia 30375

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